

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

SONRAI SYSTEMS, LLC,	)	Case No. 1:21-CV-02575
	)	
Plaintiff,	)	
	)	
v.	)	Honorable John Robert Blakey
	)	
WASTE CONNECTIONS OF CANADA, INC.,	)	
	)	
Defendant.	)	
	)	

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**PLAINTIFF SONRAI SYSTEMS, LLC  
MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiff, Sonrai Systems, LLC (“Plaintiff” or “Sonrai”), by and through its counsel, respectfully moves under Local Rule 26.2 and the Agreed Confidentiality Order (“Order,” ECF No. 84) for leave to file under seal its Response in Opposition to Defendant’s Motion to Compel (“Response”). The Order provides that “[a]ny party wishing to file a document designated as Confidential Information or Highly Confidential Information in connection with a motion, brief or other submission to the Court must comply with LR26.2.” Order ¶ 8. Local Rule 26.2 provides that a party may move the Court for leave to file documents under seal if, at the same time, the party provisionally files the documents under seal and files a public-record version of the motion with the confidential information and documents excluded. L.R. 26.2(c).

Sonrai seeks to file these documents under seal because they contain confidential information, which Sonrai has designated as confidential. Sonrai has complied with the Order and Local Rule 26.2 by filing this motion at the same time that it provisionally filed the Response under seal and filed a public-record version of the Response. Sonrai has also provided the Court and Defendant Waste Connections of Canada Inc.’s counsel with a complete and unredacted version of the Response. Sonrai has submitted to the Court a proposed order for its consideration.

Dated: April 5, 2024

By: /s/ J. Scott Humphrey

J. Scott Humphrey

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*Attorney for Plaintiff Sonrai Systems, LLC*

**CERTIFICATE OF SERVICE**

I certify that, on April 5, 2024, a true and correct copy of the foregoing document was served electronically through the Northern District of Illinois CM/ECF electronic filing on all counsel of record.

/s/ J. Scott Humphrey

*Attorney for Plaintiff Sonrai Systems, LLC*